

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DINO J. KALANDRAS,
3008 Benson Avenue
Baltimore, MD 21223

2011 DEC 19 P 2:1b

Plaintiff,

DEPUTY
BY...

-vs-

Case No:

WMM 11 CV 3642

BRAWNER BUILDERS, INC.,
6 North Park Drive, Suite 106
Hunt Valley, MD 21030

Serve On: Resident Agent, Jeffrey A. Bird

Defendant.

O'BRYAN BAUN KARAMANIAN
DENNIS M. O'BRYAN
Attorney for Plaintiff

WRIGHT, CONSTABLE & SKEEN, LLP
STEPHEN F. WHITE
Local Counsel

COMPLAINT

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.

2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and under the General Maritime Law for unseaworthiness, maintenance, cure, and wages.

3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crew member aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.

4. On or about September 14, 2011, Plaintiff was in the course of employment aboard Defendant's vessel when it became necessary for him to handle a certain engine cover which was unsafe, unseaworthy, improperly equipped and otherwise unsuitable for handling individually when as a result of said failure to provide a safe place to work and seaworthy vessel he was injured with Defendant thereafter breaching its obligation to pay maintenance and cure in a wilful, wanton, arbitrary and callous manner entitling Plaintiff damages for aggravation of underlying condition and punitive damages and attorney fees because of the recklessness of it all.

5. Defendant's tortuous acts aforesaid caused or contributed to Plaintiff's damages, inter alia, as follows:

- a. Pain and suffering, past future;
- b. Mortification, humiliation, fright shock and embarrassment;
- c. Loss of earnings and earning capacity;
- d. Hospital, pharmaceutical and other cure expenses;
- e. Aggravation of prior condition, if any there be;
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed;

- g. Mental anguish;
- h. Found;
- i. Maintenance, cure, wages, attorney fees and/or punitive damages.

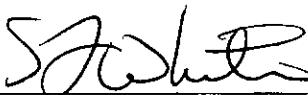
WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN KARAMANIAN

DENNIS M. O'BRYAN
Attorneys for Plaintiff
401 S. Old Woodward, Suite 450
Birmingham, MI 48009
(248) 258-6262
(248) 258-6047 - fax
dob@obryanlaw.net

-and-

WRIGHT, CONSTABLE & SKEEN, LLP


STEPHEN F. WHITE
Local Counsel
100 N. Charles Street, 16th Floor
Baltimore, Maryland 21201
(410) 659-1304
(410) 659-1350 - fax
swhite@wclaw.com

Dated: 12/19/2011